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June 5, 2025

VIA ECF

The Honorable Lewis J. Liman
United States District Court, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1620
New York, New York 10007

**Re: *Lively et al. v. Wayfarer Studios LLC et al.*, No. 24 Civ. 10049 (LJL)
[rel. No. 25 Civ. 779]**

Dear Judge Liman:

On behalf of Leslie Sloane and Vision PR, Inc. (the “Sloane Parties”), we write regarding our pending motion to compel James Vituscka to produce documents in response to a third-party subpoena. ECF No. 232.

The Sloane Parties and Vituscka have reached an agreement wherein Vituscka furnished a sworn declaration stating, in relevant part, that “Ms. Sloane never told me that Ms. Lively was sexually harassed or sexually assaulted by Justin Baldoni or anyone else.” Ex. A ¶ 5. The text messages appearing at paragraph 193 of the Wayfarer Parties’ Amended Complaint were therefore a “mistake,” the truth of which the Wayfarer Parties never confirmed prior to filing their complaints that included Vituscka’s texts without his authorization. *Id.* ¶¶ 3, 6. Vituscka has also agreed, by June 23, 2025, to produce his communications to which Bryan Freedman is a party for the time period of July 2024 through January 16, 2025.

In exchange, the Sloane Parties have withdrawn their document and deposition subpoenas and respectfully withdraw the letter motion at ECF No. 232.

We thank the Court for its consideration.

Respectfully Submitted,

/s/ Sigrid S. McCawley
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